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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91218482
Party	Plaintiff Citigroup Inc.
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Signature	/John P. Margiotta/
Date	06/27/2016
Attachments	Response to the Board Order F1986244x96B9E.PDF(67092 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

*In the Matter of:* UNIVERSAL PAYMENT PROCESSING

Application Serial No. 85/923,810

Published in the *Official Gazette* on May 27, 2014

CITIGROUP INC.,

Opposer,

- against -

MICHAEL RADLOVIC and  
NANCY BIRENBAUM,

Applicants.

Opposition No. 91218482

## OPPOSER'S RESPONSE TO THE BOARD'S ORDER

On June 17, 2016, the Board in this proceeding noted that Applicants had failed to appear and that the Application at issue in this proceeding stands abandoned due to occurrences in a separate Board proceeding. *See* TTABVue Docket No. 14. In addition, the Board permitted Citigroup Inc. (“Opposer”) to indicate whether, under the circumstances, “it wishes to go forward and obtain a judgment on the opposition.” *Id.*

Although the application at issue in this proceeding has been abandoned as a result of parallel proceedings, Opposer does wish to move forward in this proceeding, and obtain a default judgment against the Applicants. We, therefore, request that the Board enter default judgment based on Applicant's apparent loss of interest in this case.

Dated: New York, New York  
June 27, 2016

Respectfully submitted,

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

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*Attorneys for Opposer Citigroup Inc.*

### CERTIFICATE OF SERVICE

The undersigned counsel for Opposer Citigroup Inc. hereby certifies that a true and correct copy of the attached foregoing **OPPOSER'S RESPONSE TO THE BOARD'S ORDER** was served via mail, postage prepaid, upon Applicants' correspondent of record: Michael Radlovic, 3281 East Guasti Rd., Suite 800 Ontario, CA 91761, on this 27<sup>th</sup> day of June, 2016.

  
John Margiotta